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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,  
  
Plaintiff,  
  
vs.  
  
RIOT GAMES, INC.,  
  
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM

HON. FERNANDO M. OLGUIN

PLAINTIFF'S SECOND AMENDED  
COMPLAINT (SAC)

DATE: FEBRUARY 27, 2025  
TIME: 10:00 A.M.  
CRTRM: 6D

COMPLAINT FILED: OCTOBER 31, 2024  
DEFAULT JUDGMENT FILED JANUARY  
07, 2025:  
COMPLAINT - SHORT FORM: JANUARY  
01, 2025  
AMENDED COMPLAINT FILED:  
JANUARY 04, 2025- ACCEPTED:

JANUARY 29, 2025

Dated this: JANUARY 29, 2025

*M. WOLSTENHOLME*

[MARC WOLSTENHOLME]

**I. INTRODUCTION TO CASE (bad faith background)**

Plaintiff, Marc Wolstenholme ("Plaintiff"), respectfully submits this Opposition to Defendant Riot Games, Inc.'s ("Defendant") second Motion to Dismiss (27 January 2025) under Rule 12(b)(6) and Motion for a More Definite Statement under Rule 12(e). Defendant's motion erroneously asserts that Plaintiff's Complaint fails to meet the pleading standards under the Federal Rules of Civil Procedure. Contrary to Defendant's arguments, Plaintiff's Complaint sufficiently alleges facts that, if true, state claims for relief under the Copyright Act, California's Unfair Competition Law, and other causes of action. Additionally, the Complaint provides the Defendant with sufficient notice to prepare an appropriate defense.

The Defendant threatened to have the case kicked out before any hearings, then engaged in behaviors alleged to be deliberate attempts to circumnavigate the law and to frustrate the plaintiff and to create legal technicalities, after already being informed of the stress and emotional harm these behaviors are causing. The Defendant has already filed a Motion to Dismiss (January 3, 2025) which dictated the Plaintiff's response, as the Plaintiff filed a first amended complaint in response to this Motion to Dismiss. This is alleged to have been a bad faith and unethical tactic to coercively control the filing of information and the narrative of these cases. Moreover, The Plaintiff has been complaining about these behaviors and bad faith negotiations across many filings and correspondence.

The Defendant remains unwilling to answer any of the Plaintiff's requests or questions or pre-litigation discovery at all. Indeed, the conferences have been one-sided telling

1 the plaintiff the they will have the case kicked out with motions to dismiss, and ignoring the  
2 plaintiff's offers to address the purported deficiencies.

3           Plaintiff has exchanged many communications with the Defendant, providing  
4 upwards of 1000 strands of evidence supporting his allegations. These communications,  
5 spanning months, gave Defendant ample opportunity to understand the Plaintiff's complaints.  
6 Furthermore, Defendant has failed to serve any response or notices to the Plaintiff and failed to  
7 file a proper response to the court summons. Plaintiff also filed an amendment to the complaint,  
8 which has been accepted by the district court and served on the Defendant prior to the Motion to  
9 Dismiss being filed with the federal court. Yet they still filed it. As for the second Motion to  
10 Dismiss (27 January 2025), the Plaintiff had already addressed all of these purported deficiencies  
11 in a preemptive report addressing the concerns, tiled PLAINTIFF'S OPPOSITION TO  
12 DEFENDANT'S MOTION TO DISMISS - pre-emptive. This was filed and accepted by the  
13 court before the second Motion to Dismiss was filed. This is bad faith, manipulative and bullying  
14 of a party who is clearly more vulnerable, and has already expressed his concerns of being  
15 emotionally troubled by these behaviors.

16           Plaintiff alleges this is a continuation of the bad faith negotiations and threats  
17 against a vulnerable adult. Plaintiff argues that the Defendant's Motion to Dismiss is not an  
18 honest reflection of the Plaintiff's efforts to engage with pretrial discovery as the primary means  
19 for clarifying claims. Plaintiff further alleges that the Defendant has refused to cooperate and  
20 obstructed his attempts to advance the complaints and engage in pretrial discovery. Defendant's  
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1 motion lacks merit as it misrepresents Plaintiff's efforts and disregards the case management  
2 hearing already set with the district court.

3 **INTRODUCTION TO PLAINTIFF'S SECOND AMENDED COMPLAINT (SAC)**  
4

5  
6 Plaintiff Marc Wolstenholme ("Plaintiff"), a UK resident and the owner of the  
7 copyrighted material known as the M.W. Wolf catalogue of fiction, brings this action against  
8 Defendant Riot Games, Inc. ("Defendant"), a California-based video game development  
9 company.  
10

11 Plaintiff owns the exclusive copyright to "Bloodborg: The Harvest" by M.W.  
12 Wolf, created between 2018-2019.  
13

14 Plaintiff alleges that Defendant infringed his copyright by using the manuscript of  
15 "Bloodborg: The Harvest" submitted to Riot Forge, Curtis Brown Group, and others in 2019 and  
16 2020 to create the animated series ARCANE and its spin-offs including but not limited to, The  
17 Blood Sweat and Tears music video, and Welcome to Noxus - Bite Marks (ft. TEYA), 2025  
18 Season 1 Cinematic - League of Legends. The Plaintiff further alleged that the whole of Riot  
19 Games' lore and backstories have been retconned to align with the infringed upon narratives,  
20 thus the Infringement is now deeply intertwined into all of Riot Games' products, games and  
21 shows.  
22  
23

24 Plaintiff asserts that Defendant's animated show and promotional materials derive  
25 narrative elements, themes, aesthetics, and character arcs from Plaintiff's copyrighted work.  
26

1  
2 Plaintiff seeks damages for the harm suffered, statutory damages, and an  
3 injunction to prevent further infringement.  
4

5 **Cases**

6 (1) COPYRIGHT INFRINGEMENT (17 U.S.C. § 501)

7 (2) VICARIOUS COPYRIGHT INFRINGEMENT (17 U.S.C. § 501)

8 (3) UNFAIR COMPETITION (17 U.S.C. § 501)

9 (4) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED):  
10

11 CALIFORNIA CIVIL CODE § 1708.ACTION FILED DATE: OCTOBER 31, 2024 - 3  
12

13 **JURISDICTION AND VENUE**

14 5. This Court has jurisdiction pursuant to 28 U.S.C. § 1338(a) as this matter arises  
15 under the U.S. Copyright Act (17 U.S.C. § 501).  
16

17 6. Venue is proper in this Court pursuant to 28 U.S.C. § 1400(a) as Defendant  
18 Riot Games, Inc. maintains its principal place of business in Los Angeles County, California.  
19

20 **PARTIES**

21 7. Plaintiff Marc Wolstenholme is a UK resident and owner of the M.W. Wolf  
22 catalogue of fiction.  
23

24 8. Defendant Riot Games, Inc. is a video game development company  
25 headquartered in Los Angeles, California.  
26

**FACTUAL ALLEGATIONS**

9. Plaintiff created the work "Bloodborg: The Harvest" between 2018 and 2019 and holds the exclusive copyright to this literary work.

10. In early 2020, Plaintiff submitted the manuscript of "Bloodborg: The Harvest" to Riot Forge, Curtis Brown Group, and others.

11. Plaintiff alleges that Defendant Riot Games unlawfully copied significant portions of his manuscript to create the animated series ARCANÉ, which premiered on Netflix in November 2021.

12. Plaintiff asserts that characters, plotlines, thematic elements, and narrative structure in ARCANÉ mirror those found in "Bloodborg: The Harvest."

13. Plaintiff further alleges that the official music video "Blood Sweat & Tears" by Riot Games, featuring Sheryl Lee Ralph, derives directly from elements of "Bloodborg: The Harvest."

14. Defendant continues to profit from ARCANÉ and related products despite being notified of the alleged infringement in November 2021.

1 15. Defendant's legal representatives responded with the threat of extensive legal  
2 fees, causing Plaintiff emotional distress and further exacerbating his existing complex PTSD.  
3

4  
5 **FIRST CAUSE OF ACTION**

6 (Copyright Infringement – 17 U.S.C. § 501)  
7

8 16. Plaintiff incorporates paragraphs 1 through 15 by reference.

9 17. Defendant, without authorization, copied, distributed, and publicly displayed  
10 Plaintiff's copyrighted material. Furthermore, the showrunners accepted awards for this infringed  
11 material.  
12

13 18. Defendant's unauthorized use of Plaintiff's work constitutes direct copyright  
14 infringement.  
15

16 19. Plaintiff has suffered damages as a direct result of Defendant's infringement  
17 and is entitled to statutory damages and injunctive relief under 17 U.S.C. § 504.  
18

19 **SECOND CAUSE OF ACTION**

20 (Vicarious Copyright Infringement – 17 U.S.C. § 501)  
21

22 20. Plaintiff incorporates paragraphs 1 through 19 by reference.  
23  
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1 21. Defendant benefited financially from the unauthorized use of Plaintiff's  
2 copyrighted material through partnerships with Netflix, Fortiche Production SAS, and others.

3 22. Defendant had the ability to control and supervise the infringing conduct but  
4 failed to prevent it.

5 23. Plaintiff seeks statutory damages and injunctive relief to prevent further  
6 vicarious infringement.  
7

8  
9 **THIRD CAUSE OF ACTION**

10 (Unfair Competition – Cal. Bus. & Prof. Code § 17200)  
11

12  
13 24. Plaintiff incorporates paragraphs 1 through 23 by reference.

14 25. Defendant engaged in unlawful and unfair business practices by  
15 misappropriating Plaintiff's copyrighted material for commercial gain.  
16

17 26. Defendant's conduct caused Plaintiff significant financial harm and  
18 reputational damage.

19 27. Plaintiff seeks restitution, disgorgement of profits, and injunctive relief to  
20 prevent further unfair competition.  
21

22 **FOURTH CAUSE OF ACTION**

23 (Intentional Infliction of Emotional Distress – Cal. Civ. Code § 1708)  
24  
25



1 28. Plaintiff incorporates paragraphs 1 through 27 by reference.

2 29. Defendant's legal representatives threatened Plaintiff with excessive legal fees  
3 and dismissal of his claims, knowing Plaintiff was a vulnerable adult with complex PTSD.  
4

5 30. Defendant's conduct was extreme, outrageous, and beyond the bounds of  
6 decency, causing Plaintiff severe emotional distress.  
7

8 31. Infringed work is trauma writing, stealing one's trauma writing, especially  
9 given the content of it, and misusing it, and airing it for all to see, in a manner it wasn't intended,  
10 is akin to stealing one's therapy and medication and causing relentless and continued triggering.  
11 Moreover, it is alleged that Riot Games has added Gaslighting into the actual show. Furthermore,  
12 the endless threats to have the cases kicked out before any hearing, the complete disregard for  
13 the law and for the plaintiff's hardship and the unwillingness to take responsibility for their  
14 actions, along with the endless legal technicalities and diversions, all adds to the emotional and  
15 psychological toll and pain caused. As does the needless misrepresentation of the plaintiff's  
16 complaints.  
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1 Plaintiff seeks compensatory and punitive damages for the emotional harm  
2 suffered.

3  
4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

6 Statutory damages for copyright infringement pursuant to 17 U.S.C. § 504.

7 Injunctive relief to prevent further infringement.

8 Disgorgement of profits and restitution under Cal. Bus. & Prof. Code § 17200.

9 Compensatory and punitive damages for emotional distress.

10 Reimbursement of legal fees and costs.

11 Any other relief deemed just and proper by the Court.

12  
13  
14  
15  
16 The Plaintiff, Marc Wolstenholme, M.W. Wolf.

17 Date: JANUARY 29, 2025

18 Signed: *M. WOLSTENHOLME.*

1                   **1. Pre-Emptive defense against DEFENDANT’S MOTION TO DISMISS**  
2                   **PURSUANT TO AMENDED COMPLAINT UNDER FEDERAL RULE**  
3                   **OF CIVIL PROCEDURE 12(B)(6) FOR FAILURE TO STATE A**  
4                   **CLAIM.**

5  
6                   **Originally filed- JANUARY 17, 2025.**

7  
8                   **On January 16, 2025, 19:20 (GMT), Defendant emailed the Plaintiff, the**  
9                   **“Riot intends to move to dismiss this Amended Complaint under Federal Rule**  
10                   **of Civil Procedure 12(b)(6) for failure to state a claim.”**

11  
12  
13                   ***THE FULL EMAIL STATED:***

14  
15                   *Rule 7-3 Meet and Confer, Case 2:25-cv-00053-FMO-BFM*

16                   *Mr. Wolstenholme,*

17                   *We have received a copy of your Amended Complaint, which was filed with the*  
18                   *federal court on January 13. A copy of the Notice of Electronic Filing is attached for your*  
19                   *reference. In light of the Amended Complaint, Riot’s original motion to dismiss is moot (see*  
20                   *attached order from the Court).*

21  
22                   *Riot intends to move to dismiss this Amended Complaint under Federal Rule of*  
23                   *Civil Procedure 12(b)(6) for failure to state a claim. As to your two copyright claims, you have*  
24                   *not alleged a plausible claim for relief, including because you have not included any factual*  
25

1 *allegations regarding what protected expression of your work has been infringed by Riot and*  
2 *have not included sufficient allegations regarding access (i.e., how you contend Riot received a*  
3 *copy of your work), among other deficiencies. As to your two state law claims, they fail to state*  
4 *a claim for relief for a few reasons. Your claim for unfair competition is preempted by the U.S.*  
5 *Copyright Act. Your claim for intentional infliction of emotional distress, as far as we*  
6 *understand it, is time barred (outside the statute of limitations), barred by the litigation*  
7 *privilege, and otherwise fails to allege a plausible claim for relief.*

9 *I am happy to discuss these issues further in a telephone call. Please note that*  
10 *our deadline to file our motion to dismiss is January 27. Please let me know if you would like a*  
11 *further phone call to discuss, and if so, please provide your availability to do so.*

13 *Regarding the other issues you've raised in your recent emails, I will respond in a*  
14 *separate email.*

15 *Sincerely,*

16 *Josh Geller"*

## 19 **2. The Plaintiff Alleges**

20 The Plaintiff alleges that, instead of addressing the complaints, the Defendant is  
21 attempting to circumnavigate justice by creating legal technicalities and misrepresenting the  
22 claims to further frustrate and cause harm. The plaintiff states for over 3 years, the defendant has  
23 failed to investigate his complaints or sufficiently address them. The Plaintiff believes that the  
24 endless spurious motions are designed to overwhelm him and make him slip up, missing  
25

1 deadlines or failing to respond to the court. The Plaintiff states that he has 1000s of pieces of  
2 evidence to compile into court bundles and the Defendant is aware of this. The defendant had  
3 previously threatened to have the case kicked out of court before any hearings and these threats  
4 have been provided to the court.  
5

6 **3. Addressing each section of the email of pending motion.**

7 3a. Mr. Geller wrote. *"We have received a copy of your Amended Complaint,*  
8 *which was filed with the federal court on January 13. A copy of the Notice of Electronic Filing*  
9 *is attached for your reference. In light of the Amended Complaint, Riot's original motion to*  
10 *dismiss is moot (see attached order from the Court)."*  
11

12  
13 The Plaintiff states that Mr. Geller has had many complaints over many months,  
14 ensuring that both he and his client are fully aware of the complaints and the infringements. The  
15 Plaintiff was made aware of the Copyright infringement after the release of Arcane on Netflix on  
16 the 23<sup>rd</sup> of November 2021. It would have been impossible for the Plaintiff to be aware of the  
17 infringement before this date. The Plaintiff contacted Riot Games the day after. After the 2021  
18 threats from the defendant in letters, which have been added to previous declarations, the  
19 Plaintiff was wrongly led to believe that he was too weak and vulnerable and too poor to seek  
20 legal justice against such a powerful and rich company. The plaintiff was too ill to pursue justice  
21 at that time. In better health and mind, the plaintiff filed a complaint with the district court and  
22 began these proceedings in October 2024, before the end of the three years, as provided by 17  
23 U.S.C. § 507(b).  
24  
25

COMPLAINT WAS FILED ON OCTOBER 31, 2024

DEFAULT JUDGMENT FILED JANUARY 07, 2025:

COMPLAINT - SHORT FORM: JANUARY 01, 2025

AMENDED COMPLAINT FILED: JANUARY 04, 2025- ACCEPTED:

Case 2:25-cv-00053-FMO-BFM Amended Complaint filed JANUARY 13, 2025

**3b. Defense Against Rule 12(b)(6) Motion: Failure to State a Claim.**

Mr. Geller (defendant) wrote “*As to your two copyright claims, you have not alleged a plausible claim for relief, including because you have not included any factual allegations regarding what protected expression of your work has been infringed by Riot.*”

***Introduction:***

In response to Riot’s anticipated motion to dismiss the Amended Complaint under Rule 12(b)(6) for failure to state a claim, the plaintiff submits the following defense. Riot argues that the copyright claims are not plausible because the Amended Complaint does not sufficiently identify the protected expression of the plaintiff’s work that has allegedly been infringed. However, the Amended Complaint, when viewed in its entirety and construed in the plaintiff’s favor, states a valid copyright infringement claim with sufficient detail to meet the pleading standards established under Twombly and Iqbal.

Additionally, On January 13, 2025, the plaintiff filed DECLARATION OF MARC WOLSTENHOLME In Support of Request PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION TO DISMISS PURSUANT TO FEDERAL RULE OF CIVIL

PROCEDURE 12(B)(6) AND MOTION FOR A MORE DEFINITE STATEMENT  
PURSUANT TO RULE 12(E).

In this document, under 17a. Preliminary Evidence section, the Plaintiff listed 100 unique examples of narratives, prose, story beats, designs, aesthetics, characters and more, of which is alleged to have been stolen from Bloodborg to make Arcane.

Additionally, under 17b of the same document, the Plaintiff listed 7 examples of Psychosis and mental illness as trauma responses in Bloodborg and Arcane characters- matched.

Additionally, JANUARY 15, 2025, the Plaintiff filed DECLARATION OF MARC WOLSTENHOLME OVERVIEW OF CHARACTER EVIDENCE. COMPARISON OF CHARACTERS FROM ARCANE & BLOODBORG. WITH REFERENCE TO POV'S FROM BLOODBORG AND PSYCHO-EMOTIONAL ANALYSIS. VI VS ROOK, PLUS ELEMENTS BORROWED FROM OTHERS IN BLOODBORG. This document is a 38-page overview of the macro structure Comparing Vi of Arcane to Rook of Bloodborg.

The Plaintiff has provided the Defendant with over 20 videos breaking down every moment of Episode 1 of Arcane to show how and where it was alleged to have been lifted from Bloodborg. In time the Plaintiff will provide both micro and macro evidence of the whole of Arcane.

**3c. Legal Standard for a Rule 12(b)(6) Motion:**

Under Rule 12(b)(6), a court may dismiss a complaint only if it fails to state a claim upon which relief can be granted. The court must assume that all allegations in the

1 complaint are true and must draw all reasonable inferences in favour of the plaintiff. The plaintiff  
2 need only present enough facts to make the claim plausible on its face, not to prove the case at  
3 this stage. The plaintiff will continue to compile and file masses of evidence, but this will take  
4 time. The Supreme Court's rulings in *Bell Atlantic Corp. v. Twombly* (2007) and *Ashcroft v.*  
5 *Iqbal* (2009) clarified that while a complaint must provide more than mere "labels and  
6 conclusions," it is not necessary to provide detailed factual allegations. Instead, a plaintiff must  
7 provide enough factual content to allow the court to infer a plausible claim.  
8

9 **3d. Copyright Infringement Requirements:**

10 To state a claim for copyright infringement, a plaintiff must show:

- 11 (a) Ownership of a valid copyright;  
12  
13 (b) Copying of constituent elements of the work that are original.

14 The plaintiff's Amended Complaint clearly states ownership of the copyrighted  
15 work and alleges that Riot has copied original, protectable elements of that work. The Plaintiff  
16 has added a copyright registration case number, and other evidence of Ownership of a valid  
17 copyright to this motion. See section for an overview of Ownership of a valid copyright.  
18

19  
20 **3e. Allegation of Copyrighted Expression:**

21 Riot contends that the plaintiff has failed to specify what protected expression has  
22 been infringed. However, the Amended Complaint sufficiently identifies the nature of the  
23 copyrighted material and the elements that are protectable under copyright law. Additionally, the  
24 prelitigation communications have presented substantial evidence over many months.  
25



1 Additionally, other named declarations have presented evidence. More evidence will be  
2 presented in this motion. See section 4 for a Structural overview- examples of Substantial  
3 Similarities.

4  
5  
6 **3f. Identification of Original Elements:**

7 The complaint explicitly states 100 elements of Bloodborg alleged to have been  
8 used in Arcane accounting for a substantial amount of Arcane. The complaint explicitly  
9 describes seven key examples of psychosis and mental illness as trauma responses in Bloodborg  
10 and Arcane characters- matched. This accounts for many of the themes and tones which Arcane  
11 has been praised for. Moreover, it is alleged that these elements directly refer to the plaintiff's  
12 personal trauma from medical records and this has also been provided to the Defendant.

13  
14 Many protectable elements have been listed and explained including characters,  
15 POV's story beats, storylines, fictional technologies, aesthetics, dialogue, themes, tone and even  
16 two characters being transformed into Bloodborgs, which is the title of the book the plaintiff  
17 alleges has been infringed upon. The plaintiff's amended complaint and subsequent documents  
18 filed to the court further alleges that Riot's work contains direct and substantial similarities to  
19 these elements.  
20

21  
22 **3g. Substantial Similarity:**

23 Under copyright law, to prove infringement, a plaintiff need only show that the  
24 two works are "substantially similar" in protectable elements. It is not necessary at the pleading  
25

1 stage to conduct a detailed side-by-side comparison of every element. The plaintiff has alleged  
2 sufficient facts to support the conclusion that substantial similarity exists, including specific  
3 elements of the work that have been copied. The complaint includes allegations of specific  
4 similarities between the two works, which are sufficiently detailed to establish a prima facie case  
5 of substantial similarity at this stage of the proceedings.  
6

#### 7 **4. Structural overview examples of Substantial Similarities**

8 This is a preliminary factual overview comparison to establish a prima facie  
9 case of substantial similarity at this stage of the proceedings.  
10

##### 11 **4a. World-Building and Setting**

12 *Bloodborg: The Harvest* features a post-apocalyptic world ravaged by  
13 environmental collapse, war, and technological manipulation. The narrative is set in a world  
14 where blood is the most valuable commodity, and genetic manipulation is rampant. The Ark and  
15 Assemblage represent the last bastions of civilization, with giant walls isolating and protecting  
16 the elite. New Kowloon is a walled city in the sky (Sunken former Manhattan). High platforms,  
17 Gangways, monorails and sky-rails were built to lift the city out of the water and out of the  
18 smog-filled underbelly, but even the sky city fell into disrepair and degradation after New  
19 Kowloon gained state independence and was shut off from the mainland, causing riots and  
20 conflicts coined “The Great Bridge dumping”. New Kowloon now has three main districts,  
21 known by many names, Warwick calls the districts, Needles, Tetris and Mouth. The three  
22 districts symbolize bipolar and mental illness. Needles, the manic sharp high. Mouth, the deep,  
23  
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26

1 dark devouring depressive. And Tetris, the bright and active in between, the normality and vices  
2 one uses to mask, regulate and overcome the highs and lows.

3         *Arcane*: similarly takes place in a dystopian setting, split between the rich city of  
4 Piltover and the impoverished, chaotic smog-filled undercity of Zaun. The city is divided by  
5 class, with the elite in Piltover using advanced technology to maintain their status, while Zaun is  
6 plagued by poverty, corruption, and exploitation. *Arcane*'s representation of these settings is  
7 very different to the LOL games settings. *Arcane* episode one opens with Zaun being shut off  
8 from Piltover, causing riots and conflicts on the Bridge, in which many things are dumped.  
9

10         **Similarity:** Both worlds involve stark class divisions, with the wealthy elite  
11 controlling advanced technology, while the poor suffer under harsh smog-filled conditions. Both  
12 settings explore the themes of inequality, oppression, and the societal consequences of  
13 technological advancement. Both feature isolated enclaves of civilization (Ark, Assemblage,  
14 Piltover), while the outside world (the Nullifidian and Zaun) is in chaos. This is further  
15 represented in Bloodborg's layered and cyclical narrative style (also used in *Arcane*), by creating  
16 the same class struggles dynamics between the three districts of New Kowloon. It is further  
17 represented with the Under Lanes and the topside, adding a 3-d like worldbuilding literary device  
18 (Classes, within classes and cities within cities). The opening scene of *Arcane* is strikingly  
19 similar to "The Great Bridge dumping" of Bloodborg. This is just one of many scenes that will  
20 be presented and evidenced during these court proceedings.  
21  
22  
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24

#### 25         **4b. Technology and Cyborgs**

1           **Bloodborg:** The Harvest centers around the creation of Bloodborgs—cybernetic  
2 beings that are the ultimate blend of AI, robotics, and human tissue, all made possible by the  
3 blood of the youth. Specially selected human blood is the base ingredient in many concoctions  
4 and drugs which have different effects based on what they are used for. The main blood drug is  
5 called Fetal Sapien Serum. Bloodborgs (creations) serve as the pinnacle of human evolution,  
6 with a focus on immortality and control through technology. Fusion energy, teleportation infinity  
7 devices and blue electromagnetic balls are central to the storytelling.

9           **Arcane:** presents a world with advanced technology, particularly in the form of  
10 Hextech energy and its blue crystal balls which merge magic and machinery to create powerful  
11 devices. Cyborgs in Arcane are less stated, with characters like Jinx, Sevika and Viktor being  
12 deeply tied to Shimmer (a blood drug), technology, and themes of control and technological  
13 manipulation play a significant role in the storyline. Shimmer is a drug in Arcane, alleged to be  
14 remarkably similar to Fetal Sapien Serum and its effects. Jinx in Arcane is kept alive via  
15 shimmer. Both Arcane’s Viktor and Warwick transform into Bloodborgs via selected blood and  
16 shimmer. Viktor calls this the “Glorious Evolution.” Glorious Evolution was a “treasured  
17 gateway” voice line from the LOL game, which is very different, even unrecognizable to Arcane.  
18 Teleportation infinity devices are also in Arcane, one being a device embedded in Jayce’s  
19 forearm, and another called hexgates.

22           **Similarity:** Both works explore the idea of humanity merging with blood  
23 technology, with *Bloodborg: The Harvest* showcasing literal cyborgs and bloodborgs and Arcane  
24 depicting characters whose fates are entwined with powerful technological artefacts, cyborg  
25

1 advancements and bloodborgs. Both stories question the morality and consequences of such  
2 advancements. These stories have hundreds of remarkable similarities in deeply complex and  
3 very specific ways. Both stories share the same tones, themes, settings, chapters, cyclical  
4 storytelling, POV's, characters (different from the games), repetitive trauma writing and duality  
5 in both linear and abstract ways.  
6

1                   **4c. Characterization and Protagonists**

2                   **Bloodborg:** The Harvest features a range of protagonists who are each struggling  
3 with personal conflict and external pressure. Characters like Josh Kimble, Warwick, and D’borg  
4 deal with issues of identity, trauma, and betrayal. Josh, for instance, is radicalized against the  
5 Ark, while D’borg struggles with her cyborg identity and past trauma. Each of the Pov characters  
6 and some others are being manipulated and radicalized to action via their predicaments or via an  
7 in-brain higher being.  
8

9                   **Arcane:** also has a cast of complex characters dealing with personal struggles and  
10 moral ambiguity. Vi and Jinx (formerly Powder) are central figures whose complicated  
11 relationship and past trauma drive much of the narrative. Vi struggles with loyalty, family, and  
12 justice, while Jinx grapples with abandonment and madness. Each of the POV characters are  
13 being manipulated and radicalized to action via their predicaments and via others, some via an  
14 in-brain higher being.  
15

16                   **Similarity:** Both Bloodborg and Arcane feature protagonists who are struggling  
17 with internal conflicts and past trauma, often leading them down paths of rebellion or  
18 destruction. The theme of personal growth and change is central to both narratives, and the  
19 characters’ journeys revolve around navigating complex, morally grey situations. Each character  
20 can and will be explained and compared to their alleged counterparts in many documents of  
21 evidence. In both works, the storytelling shows how each of the characters are being manipulated  
22 and radicalized to action via their predicaments and via others. In both works, trauma is central  
23  
24  
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1 to the plots, and it is alleged that this is the trauma writing of the Plaintiff's actual real-life  
2 struggles and traumas.

#### 3 4 **4d Themes of Rebellion and Control**

5 ***Bloodborg:*** The Harvest explores themes of rebellion against oppressive systems.  
6  
7 Teki Nagasaki and B are leading a resistance against the Founding Families, who are  
8 manipulating the population to build their vision of a perfect world through control of blood and  
9 technology. People can use Vada in-brain and Deep Root to contact Gaia and higher  
10 consciousness. People can be controlled via Vada in-brain and Deep Root. In Bloodborg's  
11 African Child's POV, Neva- Leader of the tribe- loses a child, and searches inside the higher  
12 realms for her dead baby. Mother Gaia sees her unwavering motherly love, determination and  
13 devotion. Mother Gaia sees that Neva is worthy of raising and protecting the earth child. Gaia  
14 sends a white-eyed child of great importance from the higher consciousness to earth to help save  
15 the planet and human race.  
16

17  
18 ***Arcane:*** similarly delves into rebellion, with characters like Vi and Jinx rebelling  
19 against the oppressive control of the Piltover elite, particularly the corrupt use of Hextech. The  
20 conflict between the rich and poor, and the desire to break free from systemic oppression, is a  
21 central theme in Arcane. Viktor travels to higher consciousness and is able to control people  
22 from it. The Arcane is a Gaia-like metaphysical presence. In the Blood sweat and Tear music  
23 video, which is an extension of Arcane, Ambessa Medarda loses a child in the same manner.  
24  
25  
26

Ambessa visits the higher realms and is gifted a white-eyed child of great importance. This child grows up to be Mel in Arcane.

***Similarity:*** Both works examine the tension between the oppressed and the elite, exploring rebellion as a response to an unfair societal structure. Both feature underground movements and characters who fight against forces of control, with a central question of how far one is willing to go in the pursuit of justice and change. Both stories have bloodborgs, both have higher consciousness, both have the white-eyed child of great importance, both settings or worlds are being manipulated and controlled. Both have a resistance hidden deep in the underbelly of the cities.

#### **4e. Tone and Narrative Structure**

**Bloodborg:** The Harvest uses a complex, non-linear narrative with multiple POVs. It shifts between different times (future past, present, future present) and locations (New Kowloon, Dunkirk, Coventry, Africa etc.), giving a sense of an expansive, interconnected world. The tone is dark and dystopian, focusing on the bleakness of the future and the corruption inherent in the society that has evolved. Circular narratives of trauma drive the characters and plot and set the tone.

**Arcane:** also employs a narrative structure with multiple perspectives, particularly focusing on the relationship between Vi and Jinx, while also exploring other key characters such as Caitlyn and Silco. The tone is similarly dark, dealing with themes of betrayal, family, and the destructive impact of power. While Arcane follows a more traditional episodic



1 structure, it still conveys an expansive narrative arc and intricate character development in a  
2 POV like manner and many of these POV's mirror those of Bloodborg. Circler narratives of the  
3 same traumas drive the characters and plot and set the tone.

4  
5 **Similarity:** Both works share a dark tone and feature expansive, layered  
6 narratives that explore trauma, loss, societal corruption and the impact of power. They also both  
7 present the idea of multiple intersecting lives, where personal stories affect larger societal  
8 change.

9  
10  
11 **Conclusion: Substantial Similarity**

12 Both Bloodborg: The Harvest and Arcane share several common themes and  
13 elements, notably:

14 The same trauma and loss and repetitive visiting of these traumas to show  
15 intrusion like flashbacks of people suffering with PTSD.

16 A dystopian smog-filled setting marked by stark class divides.

17 The exploration of the blending of humans and machines (cyborgs, advanced  
18 technology) with blood engineering to make Bloodborgs.

19 Characters struggling with personal trauma and the consequences of their choices,  
20 particularly in relation to rebellion and resistance.

21 Complex narratives with shifting timelines and multiple perspectives.

22 Blood drugs and serums to control, mutate and advance humans.

23 Higher consciousness and in-brain controlling and communicating.

1 Ther white-eyed child of great importance.

2 While Bloodborg leans more heavily into cyberpunk and the concept of bio-  
3 cybernetic warfare, and earth magic, and Arcane incorporates elements of magic and mysticism  
4 with its Hextech technology, the underlying themes of societal decay, rebellion, and the moral  
5 cost of technological advancement tie both works together. Many of the different features are  
6 alleged to be changes in names, colors or other markers, to hide their origins. Such as, Fusion to  
7 Hextech, The Rupture to the anomaly, white eyed boy to white eyed girl, windy assassin to  
8 whispering in low tones, neurotransmitter drugs administered in the eye instead of inhaling, Wu  
9 and Ling Zhang's trading shop to Benzo and his trading shop, Sant'teon to Viktor Jesus,  
10 Pinnacle of creation to glorious evolution, hyenas to wolves, and so on. These similarities make  
11 Bloodborg: The Harvest and Arcane substantially similar in terms of their core narrative  
12 elements, themes, and the type of conflict explored, despite the differing settings and specific  
13 plot details, which are alleged to be changes to fit and fix cardboard characters from LOL games  
14 and to align their nonsensical and incongruent backstories and cannon lore.

15 It should be noted that now, post receipt of Bloodborg: The Harvest by M.W.  
16 Wolf, Riot Games have retconned much of their inconsistent lore and backstories to align with  
17 Arcane. Moreover, Arcane and its characters are now deeply embedded into all of Riot Games  
18 products and merchandise.

19 This is a tiny Structural overview providing examples of Substantial Similarities.  
20 Substantial Similarities expand much wider than what has been presented in this motion to  
21 establish a prima facie case of substantial similarity at this stage of the proceedings.

1                   **5. Ownership of the work in question.**

2                   The Plaintiff will evidence the creation and ownership of Bloodborg: The Harvest  
3 via many sources dating back to late summer/ fall of 2014. At this time the Plaintiff was working  
4 on his first novel, Buried at Bedlam. Whilst the process began in 2014, the formal drafting of  
5 Bloodborg: The Harvest took place between 2028 and 2019. From late 2019 to Spring 2020,  
6 query submissions were sent to agents and Riot Forge.  
7

8                   In the Uk, The Copyright Act of 1976 provides the framework for protecting  
9 original works of authorship, including literary works, against unauthorized use. In the Uk  
10 Automatic Protection is granted. Under 17 U.S.C. § 501, any violation of the exclusive rights of  
11 a copyright owner constitutes infringement. These exclusive rights include reproduction,  
12 distribution, public performance, public display, and preparation of derivative works.  
13

14                   The Plaintiff cites both the Berne Convention and the WIPO Copyright Treaty.  
15 Article 5(2) of the Berne Convention explicitly states that enjoyment and exercise of copyright  
16 "shall not be subject to any formality," meaning registration is not required to gain protection.  
17

18                   Additionally, The Plaintiff has learnt that his work may still be required to be  
19 registered under US copyright. The Plaintiff has filed a 10-book unpublished copyright  
20 registration, citing 2025 as the completion of the last book as required by law. Bloodborg: The  
21 Harvest (of which this copyright case stands) is the second of these 10 books, written between  
22 2018 and 2019. The case number for this **copyright registration document is: 1-14654214871**.  
23 The Plaintiff has filed an AO 121 (January 17<sup>th</sup> 2025).  
24

#:578

**5a, Water damaged notes dating back to 2014.**

Development of ideas and concepts and narratives for Bloodborg: The Harvest began in 2014, with a hypnagogic dream. The plaintiff woke up in the middle of the night and scribbled down much of his dream visions (Exhibit A).

### 5b. Formal drafting of Bloodborg: The Harvest.

The formal drafting of Bloodborg: The Harvest took place between 2028 and 2019. By then Bloodborg had its own notebook. This notebook is extensive, detailing the development and notes of the whole process of creating and writing Bloodborg: The Harvest. This notebook includes a list of submissions to Literary, Film and Gaming talent agencies, including dates of submission. The Plaintiff will highlight key avenues in which Riot Games had access to the Plaintiff's work and submissions (Exhibit B).

### 5c. Digital Evidence of Ownership.

The Plaintiff can show digital creation of Bloodborg: The Harvest, with meta data of word documents, chronologies of the M.W. Wolf catalogue of fiction and text message communications about working on Bloodborg, and an editorial letter, offer of representation (Exhibit C).

**5d. Digital Evidence submissions.**

The Plaintiff will evidence digital forensics of submissions. Additionally, the plaintiff will highlight many avenues in which Riot had access to the plaintiff's work, as well as working relationships between Riot Games and agencies who had full access to all of the manuscript in question (Exhibit D).

**5e. Highlighting Ongoing Copyright Concerns.**

The Plaintiff will highlight Uk based complaints of alleged Copyright infringements of the M.W. Wolf catalogue of fiction, against Jonny Geller and Felicity Blunt of Curtis Brown Group, now a subsidiary of United Talent Agency (UTA). Many of these infringements are alleged to have also been sold to Netflix, where Arcane was distributed (Exhibit E).

**6. Factual Support:**

The plaintiff has provided factual support for the copyright infringement claim, including:

Ownership of the work in question;

A description of many of the protectable elements of the work;

Allegations of access and substantial similarity between Riot's work and the protectable elements of the plaintiff's work;

Specific examples of how Riot's work infringes upon those elements.

These allegations go beyond mere conclusions and provide factual content sufficient to give Riot fair notice of the claims against it and the grounds upon which those claims rest.

**7. Leave to Amend if Necessary:**

If the court concludes that additional detail is required, the plaintiff requests leave to amend the complaint to provide further specificity regarding the protectable elements of the copyrighted work and the alleged infringement. Courts generally allow amendments unless it would be futile to do so, and the Plaintiff believes he has stated many reasons why it is not.

1                   **8. LEGAL STANDARD**

2                   Under Rule 12(b)(6), a complaint should not be dismissed unless it fails to state a  
3 claim upon which relief can be granted. The Court must accept all factual allegations as true and  
4 draw all reasonable inferences in favor of the Plaintiff. (Ashcroft v. Iqbal, 556 U.S. 662, 678  
5 (2009); Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)). A complaint need only include  
6 "a short and plain statement of the claim showing that the pleader is entitled to relief" (Fed. R.  
7 Civ. P. 8(a)(2)).  
8

9                   Under Rule 12(e), a motion for a more definite statement is appropriate only if a  
10 complaint is "so vague or ambiguous that the party cannot reasonably prepare a response." Such  
11 motions are disfavored because the federal rules favor liberal pleading standards and pretrial  
12 discovery as the primary means for clarifying claims.  
13

14  
15                   **8a. Accommodations for Pro Se Litigants in U.S. Courts**

16                   Plaintiff in Pro Per is a UK citizen, uneducated in, and unexposed to, U.S. district  
17 and federal legal systems and laws. The plaintiff does not plead ignorance, but is trying to  
18 rapidly respect, learn and adhere to all district and federal laws and requirements. The plaintiff  
19 respectfully asks the court to note the limitations and disadvantages, but also to make reasonable  
20 adjustments for the plaintiff's personal vulnerabilities, disabilities (Complex PTSD and  
21 comorbid illnesses) and learning difference of dyslexia.  
22  
23  
24  
25  
26  
27  
28

1 Plaintiff cites the Federal Court's Duty to Construe Pro Se Pleadings Liberally. In  
2 U.S. federal courts, pro se litigants are entitled to certain accommodations. Courts are required to  
3 construe pro se filings liberally to ensure fairness.  
4

5 **Key Case Law:**

6 Haines v. Kerner, 404 U.S. 519 (1972): Established that pro se pleadings are held  
7 to "less stringent standards" than those drafted by attorneys.

8 Erickson v. Pardus, 551 U.S. 89 (2007): Reaffirmed the principle of liberal  
9 interpretation for pro se filings, emphasizing that courts must review filings in the most favorable  
10 light to the litigant.  
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**8b. Reasonable Accommodations Under the ADA.**

The Plaintiff has limitations and disabilities that affect his ability to litigate effectively, these can be evidenced on request of the court if required. The Plaintiff asserts that under the Americans with Disabilities Act (ADA), and by extension shared laws, ethical and value standards, he may be entitled to reasonable accommodations but will endeavor to meet and respect all requirements of the court.

Reasonable Adjustments:

Extensions for filing deadlines.

Allowing non-standard forms of communication, such as email, for submitting documents.

Granting additional guidance or leniency in procedural matters.

Granting mediation and protection from bullying and aggressive legal strategies of the defendant to evade lawful processes, to complicate the cases and to build falsehoods, unfair court bundles and undo stress and burden on the Plaintiff.

**9. Conclusion:**

For the foregoing reasons, the plaintiff respectfully requests that the defendant's motion to dismiss under Rule 12(b)(6) be denied. The Amended Complaint, taken as a whole, sets forth a plausible claim for copyright infringement and meets the required standard for pleading. Moreover, more details of factual allegations regarding what protected expression of Bloodborg has been infringed by Riot Games have been added to this motion (4. Structural

overview examples of Substantial Similarities). Moreover, Plaintiff has spent many months informing the defendant of 1000s of elements of infringement, and it will take many months more to collate all of the evidence. The complaint alleges that Riot had access to the plaintiff's work, given its widespread dissemination and submission to Riot Forge on April 15 & 19<sup>th</sup> 2020. Additionally, the work was submitted to Curtis Brown group who can be shown to have a working relationship with Riot Games.

Plaintiff possesses substantial evidence, including:

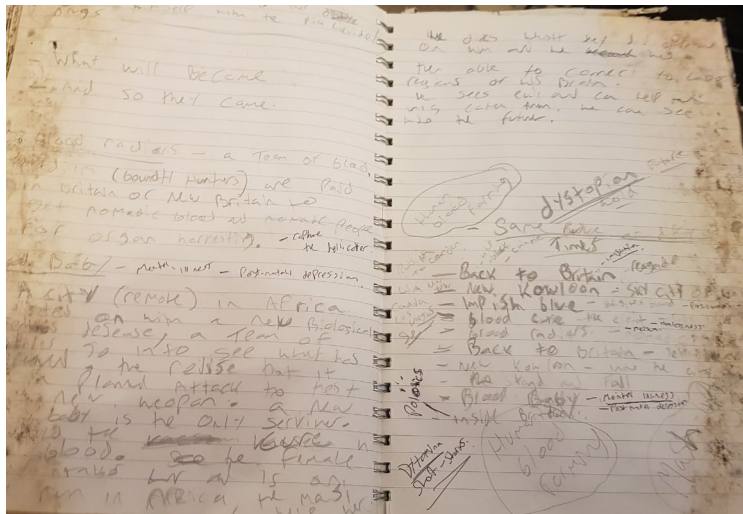
- **UK & US Copyright registration** details for "Bloodborg: The Harvest"
- **Submissions of Copyrighted** material with dates and times.
- **Comparative analyses** demonstrating substantial similarities between Plaintiff's work and Defendant's animated series "Arcane" & "Blood Sweat & Tears Official Music Video." & "Welcome to Noxus - Bite Marks."
- **Communications with Riot Games** and its subsidiaries, including Riot Forge, that demonstrate Defendant's awareness of Plaintiff's work.
- **Medical Records of the Plaintiff** paired to a Psycho-Emotional Analysis of Trauma in Arcane, demonstrating how it matches therapy of trauma writing used in Bloodborg, from medical records.
- **Records of bad faith negotiations** and legal threats and hate mail which exacerbated Plaintiff's emotional distress.

For the reasons set forth below, the Court should deny Defendant's Motion to Dismiss or, alternatively, grant Plaintiff leave to amend the Complaint.

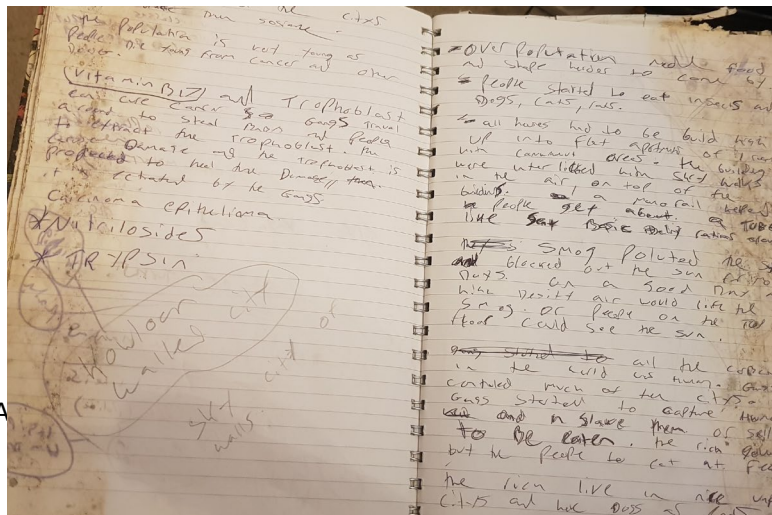
## Exhibits

### Exhibit A- Water damaged notes dating back to 2014.

#### A1.

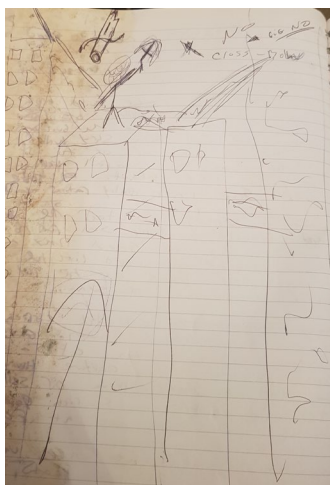


#### A2.



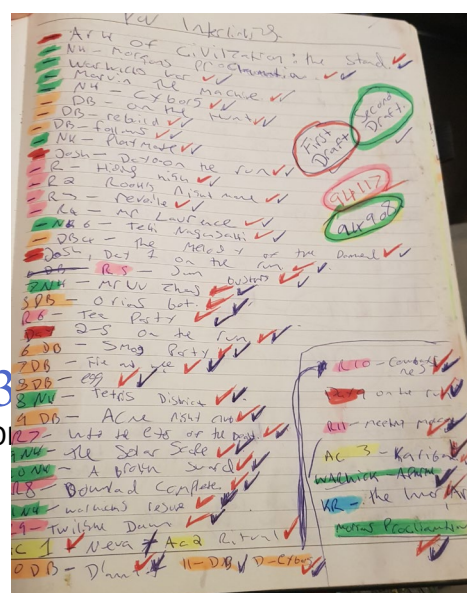
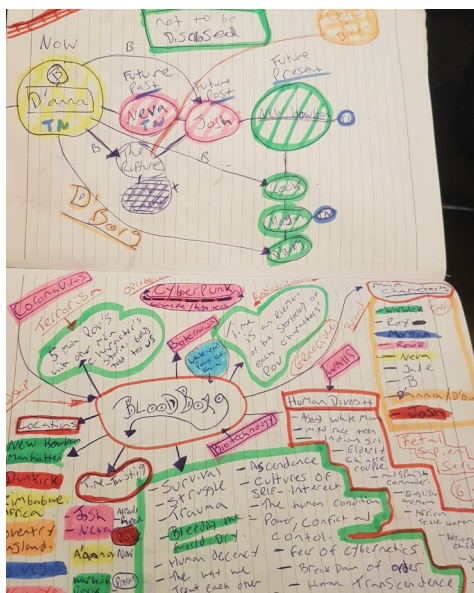
PLA

**A3.**



**Exhibit B- Formal drafting of Bloodborg: The Harvest.**

**B1.**



B2. List of submissions to Literary, Film and Gaming talent agencies, including dates of submission. This shows that Bloodborg was submitted to Riot Forge on the 15<sup>th</sup> & 19<sup>th</sup> of April.

Submissions

- + Daw (15/04/2020) X
- Darhansoff + Verrell (the Sable Agency)
- + Curtis (15/04/2020) X Creative (Brisant Fant)
- + Austin MacCauley Publisher (15/04/2020)
- + Darkflow + Nesbit UK (15/04/2020)
- + Madeline Milburn (15/04/2020)
- Berthel / Dove Authors X
- + Dagobert Woch Literary Agency (15/04/2020) X
- Harper Collins Publisher UK X
- Zero Agency Ltd. X
- Riot Forge 15 - 19

The Agency.

ATKIN ALEXANDER ASSOCIATES

- + A. M. HEATH - Oli. Munson (15/04/2020) X
- + The AMPER SAND AGENCY LTD (15/04/2020) X
- Janie Caven

as for science and fantasy R. S. L.

Submissions

- + Andrew Lownie Literary Agent
- + Andrew NUNING ASSOCIATES
- + Bell Literary + Morita
- + BLAKE FRIEDMAN
- + CORVILLE + WISH (15/04/2020)
- + DIAMOND GARDEN WOODS
- + MGA Literary
- + ROSERS CORRIDGE WHITE
- + SUSAN LEE ASSOCIATES
- + United Agents (Look again)
- + The VINEY Agency

Dr. J. Andersen Literary Agent

DHW Literary Agent

John Darrid - J. Darrid@getinter.com

LAW ASOCI - Literary Agents

Marc Jaga - The Sable Agency

Shel Land - (15/04/2020)

Unid Agent - (15/04/2020)

Zero Agency - Louise Butler (15/04/2020)

Arturus Linto - (15/04/2020)

M.C. Cheetham

MBA Literary Agency

John Darrid

Harvey Agency

The D.H. Literary Agent



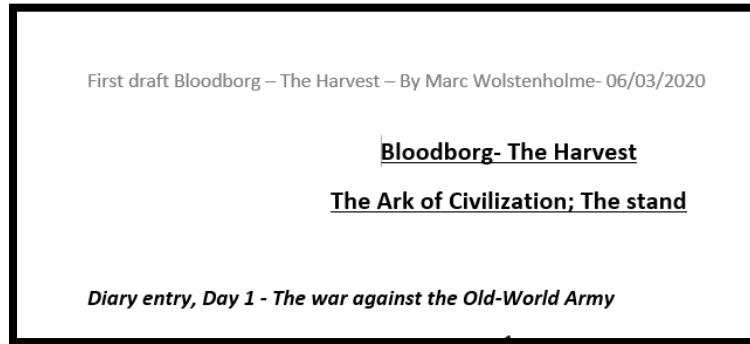
## Exhibit C- Digital Evidence of Ownership.

### C1- Stored copies of word documents.

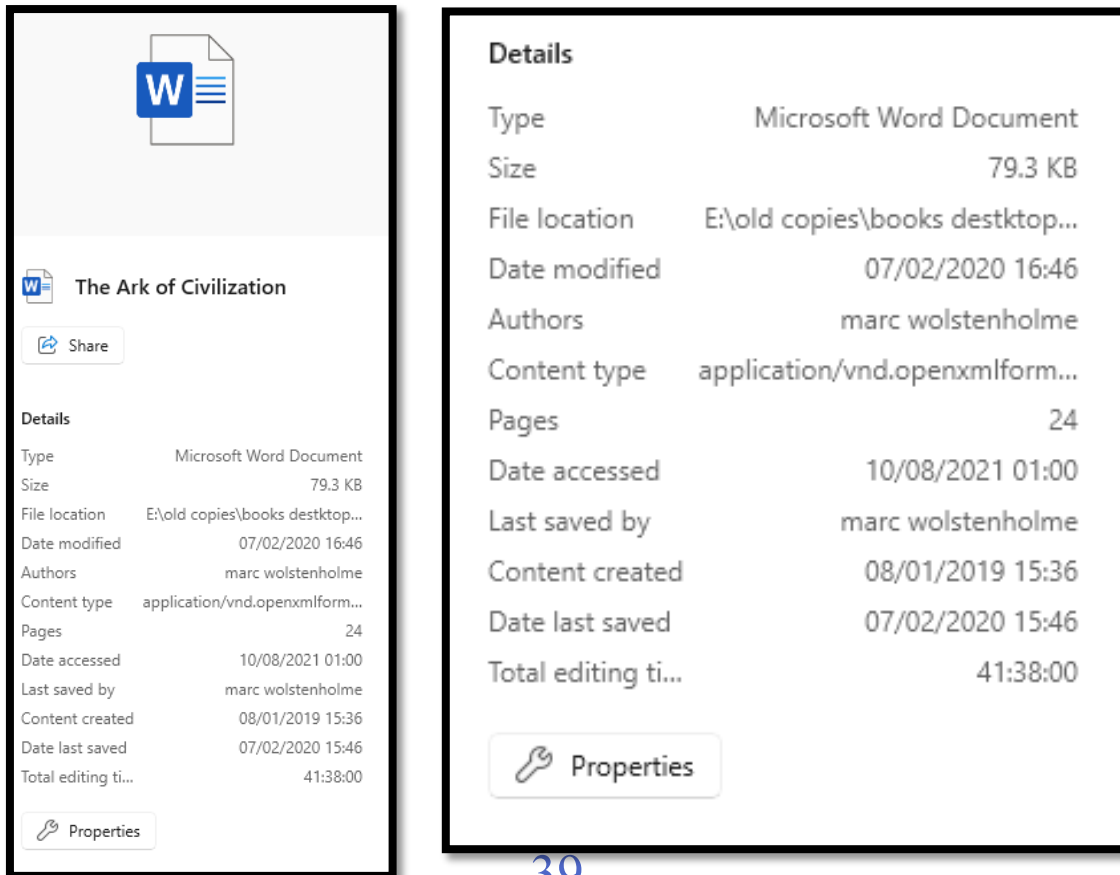
s in × +			
> Search Results in Transcend (F:) >			
<div>      Sort ▾          View ▾          Search options ▾          Close search          ...       </div>			
Date modified: 17/10/2024 02:13			
	2. Human Blood Farming- Bloodborg	F:\books desktop	
Date modified: 19/12/2023 19:32			
	Bloodborg- The Harvest	F:\books desktop\2. Human Blood Farming- Blood...	Size: 384 KB Authors: marc wolstenholme
Date modified: 21/06/2023 23:39			
	Bloodborg- The Harvest	F:\books\Human Blood Farming- Bloodborg	Size: 394 KB Authors: marc wolstenholme
Date modified: 07/10/2022 00:46			
	Viktor is becoming a bloodborg	F:\books desktop\2. Human Blood Farming- Blood...	Size: 343 KB Authors: marc wolstenholme
Date modified: 04/12/2021 23:46			
	The streets of Zaun matched up to Blood...	F:\books desktop\2. Human Blood Farming- Blood...	Size: 1.29 MB Authors: marc wolstenholme
Date modified: 01/12/2021 20:13			
	chapter of Bloodborg called Orion's belt	F:\books desktop\2. Human Blood Farming- Blood...	Size: 341 KB Authors: marc wolstenholme
Date modified: 01/12/2021 00:51			
	Bloodborg- The Harvest	F:\books desktop\2. Human Blood Farming- Blood...	Size: 392 KB Authors: marc wolstenholme
Date modified: 30/11/2021 20:45			
	Agents Bloodborg was sent to	F:\books desktop\2. Human Blood Farming- Blood...	Size: 15.9 KB Authors: marc wolstenholme
Date modified: 29/11/2021 21:58			
	16 World building from Bloodborg	F:\books desktop\2. Human Blood Farming- Blood...	Size: 1.12 MB Authors: marc wolstenholme
Date modified: 28/11/2021 20:40			
	Bloodborg Editing letter.	Type: PNG File Dimensions: 617 x 450	Size: 107 KB
	Bloodborg edit letter	F:\books desktop\2. Human Blood Farming- Blood...	Size: 572 KB Authors: marc wolstenholme
Date modified: 27/11/2021 14:55			
	Letter for Bloodborg	F:\books desktop\2. Human Blood Farming- Blood...	Size: 16.0 KB Authors: marc wolstenholme
Date modified: 24/11/2021 16:55			
	Bloodborg 10,000	F:\books desktop\2. Human Blood Farming- Blood...	Size: 47.1 KB Authors: marc wolstenholme
Date modified: 23/08/2021 15:48			
	Bloodborg 10,000 (2)	F:\books desktop\2. Human Blood Farming- Blood...	Size: 45.7 KB Authors: marc wolstenholme
Date modified: 18/09/2020 21:44			
	Bloodborg 10,000	F:\books desktop\2. Human Blood Farming- Blood...	Size: 45.7 KB Authors: marc wolstenholme
Date modified: 18/09/2020 21:44			
	Bloodborg 10,000	F:\books\Human Blood Farming- Bloodborg\submi...	Size: 45.7 KB Authors: marc wolstenholme
Date modified: 15/04/2020 21:54			
	Bloodborg- First draft - Copy	F:\books desktop\2. Human Blood Farming- Blood...	Size: 295 KB Authors: marc wolstenholme
Date modified: 15/03/2020 15:40			
	Bloodborg- First draft - Copy	F:\books\Human Blood Farming- Bloodborg\cuts	Size: 295 KB Authors: marc wolstenholme
Date modified: 15/03/2020 15:40			

**C2- First draft sent off record.**

Bloodborg was written on a laptop which is now not working. The Plaintiff will endeavor to recover the original documents dating 2018. C2 shows first draft sent off in March 2020.



**C3- The Ark of Civilization is Josh’s POV, this copy dates January 2019**



**C4- WhatsApp records between Plaintiff and his ex-girlfriend detailing the date the working title of Blood Harvesting was changed to the set title of Bloodborg, which refers to the cyborg like creations with complex blood engineering.**

23/09/2019, 20:37 - Ali: Did u mean to voicecall them?  
 24/09/2019, 00:37 - Marc: **Bloodborg**  
 24/09/2019, 00:37 - Marc: That's the name of the blood harvesting books  
 24/09/2019, 07:34 - Ali: Sounds good... i like 'Bloodvest'.  
 24/09/2019, 07:45 - Marc: That's sounds like a Halloween festival ride  
 24/09/2019, 07:45 - Marc: A cheap one

### **C5- Chronologies of the M.W. Wolf catalogue**

#### **Date of Creation/Ownership List of M.W. Wolf Books**

**Table 1 – Chronology of Creation of M.W. Wolf Books.**

<i>Dates written</i>	<i>Titles</i>	<i>Evidence</i>
<i>August 2014 - August 2018.</i>	<b>Buried at Bedlam: After the Black</b> by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion. 3, Editorial Report 4, Rejections
<i>2018- 2019</i>	<b>Bloodborg: The Harvest</b> by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion. 3, Editorial Report 4, offer for representation
<i>Late 2019</i>	<b>Six Dead Orphans</b> (Short Shory) by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion. 3, Rejections
<i>Summer 2020- Jan 2021</i>	<b>Our Fathers</b> by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion. 3, Rejections
<i>1st of April 2021- Jul 2021</i>	<b>The Shameful Kiss</b> by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion. 3, dates mentioned in queries. 3, Rejections



1	<i>Second Half of 2021</i>	<b>False Alligators &amp; Wind-up Dolls</b> (satire) by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion.
2			
3	<i>Jan 2022-April 2022</i>	<b>Mississippi Sleepers: A Woman Reborn</b> by Marc Wolstenholme (M.W Wolf Ltd)	1, Meta data of word documents 2, Emails sent after completion. 3, Rejections
4			
5	<i>Late 2019 but mostly second half of 2022.</i>	<b>Carnophobia: The Wandering (composite novel)</b> by Marc Wolstenholme (M.W Wolf Ltd).	1, Meta data of word documents 2, Emails sent after completion. 3, Rejections
6			
7	<i>July 2022 but most of it was written in Dec 2022.</i>	<b>The Ballad of Wuthering Descent</b> by Marc Wolstenholme (M.W Wolf Ltd). With a list of M. W. Wolf planned books sent to one agent.	1, Meta data of word documents 2, Emails sent after completion. 3, Rejections 4, Showcase documentation
8			
9			
10			
11	<i>May 2023</i>	<b>Lang The Orangutan</b> by Marc Wolstenholme (M.W Wolf Ltd).	1, Meta data of word documents 2, Emails sent after completion 3, Power Point presentation
12			
13	<i>April, Jun 2023-Dec 2023</i>	<b>Bee My Agent; Blood and Honey</b> by Marc Wolstenholme (M.W Wolf Ltd).	1, Meta data of word documents 2, Emails sent during and after completion. 3, Power Point presentation 4, Curtis Brown Creative course
14			
15	<i>Nov 2023-August 2024</i>	<b>The Fateless Child: Tainted Blood</b>	1, Meta data of word documents 2, Emails sent during and after completion. 3, Power Point presentations 4, Website and X page
16			
17			
18			
19			

## Date of Creation/Ownership List of M.W. Wolf Books

Table 1 (continued)

24	<i>1<sup>st</sup> March 2024</i>	<b>God's Masterful Evasion &amp; The Inverted Organelle Theory of Consciousness and</b>	1, Meta data of word documents 2, Emails sent during and after completion.
----	----------------------------------	---	---

	<i>The Universe (IO-CU). The Theory of Everything</i>	3, Power Point presentations 4, Website and X page
March 2024	Lang The Orangutan AI illustrations by M.W. Wolf	1, Meta data of word documents 2, Emails sent during and after completion. 3, Power Point presentations 4, Website and X page
8 <sup>th</sup> March 2024	<a href="https://www.mwwolf-fiction.co.uk/">https://www.mwwolf-fiction.co.uk/</a> by Marc Wolstenholme (M.W Wolf Ltd).	1, Domine 2, Meta data 3, Profile

## C6- Chronologies of Bloodborg shared with Curtis Brown Group.

### Second Book: Chronology of Bloodborg: The Harvest.

**Date of Creation/Ownership:** Marc Wolstenholme. Bloodborg: The Harvest by M.W Wolf Ltd between 2018- 2019. Meta data of word documents will confirm this, as will emails sent after completion. Editorial Report and offer for representation will also ownership.

**Table 3 – Chronology of Bloodborg: The Harvest shared with CBG.**

<u>DATE</u>	<u>EVENT</u>	<u>Evidence</u>
15 Apr 2020	Wed, 15 Apr 2020 at 22:21 I submitted Bloodborg to Felicity Blunt Curtis Brown Group. <a href="mailto:cbcsubmissions@curtisbrown.co.uk">cbcsubmissions@curtisbrown.co.uk</a> An email confirming receipt was received titled - Thank You for Your Submission: Bloodborg: The Harvest	BBE7

1 2 3 4	<i>15 Apr 2020</i>	Wed, 15 Apr 2020 at 22:31 I submitted Bloodborg to <a href="mailto:submissions@austinmacauley.com">submissions@austinmacauley.com</a>	BBE8
5 6 7	<i>9 Jun 2020</i>	Tue, 9 Jun 2020 at 15:28 I received a rejection email from <a href="mailto:cbcsubmissions@curtisbrown.co.uk">cbcsubmissions@curtisbrown.co.uk</a> tilted- Submission review results	BBE9
8 9	<i>24 Jun 2020</i>	Wed, 24 Jun 2020 at 12:43- received the letter from the Editorial Board of Austin Macauley	BBE10 & BBE 11
10 11 12	<i>23 Feb 2021</i>	Tue, 23 Feb 2021 at 22:33 I submitted Bloodborg to Ciara Finan (Jonny Geller's assistant). <a href="mailto:ciara.finan@curtisbrown.co.uk">ciara.finan@curtisbrown.co.uk</a>	BBE12
13 14	<i>16 Apr 2021</i>	Fri, 16 Apr 2021 at 18:08- Rejection from Ciara Finan	BBE13
15 16 17 18	<i>24 Nov 2021</i>	Wed, 24 Nov 2021 at 18:24 I submitted Bloodborg to Geller Office Submissions <a href="mailto:gellerofficesubmissions@curtisbrown.co.uk">gellerofficesubmissions@curtisbrown.co.uk</a> I also informed him that Arcane, an animated Netflix series, seemed to have taken my Bloodborg manuscript and modified it into their own productions.	BBE14 &BBE 15
19 20 21 22 23 24 25 26 27 28	<i>23 Jul 2023</i>	Sun, 23 Jul 2023 at 21:23- I resubmitted a different part of Bloodborg to Geller Office Submissions. This was also the first time I told him about Bee My Agent	BBE16 & BBE 17

**C7- Austin Macauley Publishers Letter for offer of representation of  
Bloodborg (June 2020).**

**Page 1**

Find text or tools Q

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Marc Wolstenholme  
7 Malthouse Crescent  
Inkberrow  
Worcestershire  
WR7 4EF

24<sup>th</sup> June 2020

Dear Mr Wolstenholme,

**RE: 'Bloodborg: The Harvest'**

Your manuscript was brought to our attention at the latest Editorial Board meeting when we discussed the potential and possibility of it being published. Having read all the reports and taken note of the Editors' opinions we can confidently state that your work was found to be a gripping and intricate narrative. The vivid and colourful prose will captivate readers drawing them into the story and holding them until the very end. The intriguing and multifaceted plot will leave readers anxious anticipating the characters fate – as well as the fate of the world – as they are taken on an extraordinary and fantastic adventure. The Board enjoyed 'Bloodborg: The Harvest' and believe it will be well received by a contemporary audience.

Since then, we have held a separate meeting with our Marketing team to explore the possibilities regarding sales and target audiences. There were certain reservations put forward concerning the fact that this would be the work of a relatively new author and would be of some risk to us as your publishers. To this end, we are not able to offer you a non-contributory contract.

We do, however, very much feel your work deserves to be published and given the opportunity to be launched for the reading public. We would like to offer you a contributory contract, thereby creating a partnership. The amount requested is a partial sum towards the considerable costs involved in publishing and then marketing the book, with its vital media coverage. This indicates that we are also invested in your book and that it is in our shared interest to endeavour towards its success.

We the pleasure of sending a contract for you to view and sign should you so wish. The contract has been tailored with the objective of being fair to both parties.

The contributory amount is stated in Clause 15 under 'Advances'. This figure is a one-off finite amount. The Accounts Department are very helpful in arranging monthly instalments, should this be required. Please tick whichever option you would prefer for your publication. We are excited to be able to offer a book trailer and author website with our agreement, as we find these to be invaluable tools when promoting your work. In addition, we are pleased to offer audiobooks as part of this package.

At Austin Macauley we feel that our authors' involvement in the production process is essential in ensuring the high quality of our publications. Our contributory contracts utilise entirely traditional production methods including typesetting, house-styling, editing, proofreading, cover design, blurb and press release content, and official registration of the ISBN. Once we have received the signed contract our Production Department will then put the whole publication process into operation.

Austin Macauley Publishers™ Ltd. CGC-33-01, 25 Canada Square, Canary Wharf, London, E14 5LQ  
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Page 2



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As the book approaches its publication date our Marketing Department will instigate a promotional strategy geared towards the specific genre and target audience of the book to maximise sales worldwide. This again is something which will be discussed in depth with you once we have accepted your work for publication.

We take great pride in what we do, and we feel that it is important for all prospective authors to fully understand what Austin Macauley hopes to achieve for every contract we offer. Our continuing success is best illustrated as we grow as a business. Our current offices in London, New York and Sharjah, and the opening of our premises in Sydney and Toronto will help support the promotion of your book in these territories. Our US office has been acclaimed with the prestigious title in Publishers Weekly as one of 2018's Fastest Growing Publishers – an award that offers testimony that we are indeed leading our authors down the right path.

Should there be anything you may wish to discuss please do not hesitate to contact us.

We would now like to take this opportunity to congratulate you on your writing which we look forward to seeing in print.

Yours sincerely,  
For and On Behalf of the Board of Editors at Austin Macauley

Michelle Vagi (Executive Editor)  
Alexander Holiday (Head of Editorial)  
Jade Robertson (International Publishing Director)

## Exhibit D- Digital Evidence submissions.

Bloodborg was discussed with agents and people in the literary industry throughout 2019. People at Curtis Brown Group, notably Felicity Blunt and Jonny Geller, were made aware of Bloodborg during this period. However, formal submissions widely took place from the 15<sup>th</sup> of April 2020.

### D1- Log of email submissions from 15th of April 2020.

1	---				
2		☆	Reminder: Bloodborg: The Harvest	Austin Publishers sent you a document to review	Inbox 01/07/2020
3		☆	Bloodborg: The Harvest	Austin Publishers sent you a document to review	Book Submi... 24/06/2020
4		★	Bloodborg: The Harvest	...Mr Wolstenholme, RE: 'Bloodborg: The Harvest' Your	Book Submi... 24/06/2020
5		★	Submission review results	...Thank you for sending in Bloodborg: The Harvest and for	Book Submi... 09/06/2020
6		★	Submissions Marc Wolstenholme / Bloodborg: The Harvest	2 ...Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi... 09/06/2020
7		★	QUERY- Bloodborg: The Harvest	2 ...[UK] Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi... 08/05/2020
8		★	Submission-Bloodborg: The Harvest by Marc Wolstenholme	2 Thank you for sending this material, but it isn't	Book Submi... 07/05/2020
9		★	RE: SUBMISSION "Bloodborg: The Harvest"	...Subject: SUBMISSION "Bloodborg: The Harvest" Title of	Book Submi... 01/05/2020
10		★	submissions Marc Wolstenholme/ Bloodborg: The Harvest	3 ...Marc Wolstenholme/ Bloodborg: The Harvest From: Marc	Book Submi... 22/04/2020
11		☆	RE: 'Bloodborg: The Harvest'	3 ...Subject: RE: 'Bloodborg: The Harvest' Morning	Book Submi... 22/04/2020
12		★	Submission of Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi... 18/04/2020
13		★	submissions- Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi... 18/04/2020
14		☆	Failure Notice	...Marc Wolstenholme/ Bloodborg: The Harvest	Inbox 15/04/2020
15		★	Submissions Marc Wolstenholme/ Bloodborg: The Harvest	...Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi... 15/04/2020
16		☆	Your submission to A.M. Heath	...for choosing to submit "Bloodborg: The Harvest" to Oli	Inbox 15/04/2020
17		★	Confirmation of receipt Re: Marc Wolstenholme/ Bloodborg: The Harvest	FOA Madeleine Milburn or Catherine Cho. Thank you ...	Book Submi... 15/04/2020
18		★	Marc Wolstenholme/ Bloodborg: The Harvest	FOA Madeleine Milburn or Catherine Cho. ...Book: Bloodborg: The Harvest, Cyber...	Book Submi... 15/04/2020
19		★	Automatic reply: Marc Wolstenholme/ Bloodborg: The Harvest/ Will Francis	Thank you so much for choosing to send your	Book Submi... 15/04/2020
20		★	New Submission	15/03/2020 Bloodborg- The Harvest Synopsis	Book Submi... 15/04/2020
21		☆	Evidence	The text messages on my phone show that this is	Sent 29/01/2020
22		☆	WhatsApp Chat with Ali	2 Chat history is attached as "WhatsApp Chat with	Inbox 26/01/2020
23		★	Cover letter for Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 27/09/2020
24		☆	Bloodborg: The Harvest By Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 27/09/2020
25		★	Automatic reply: Bloodborg: The Harvest, By Marc Wolstenholme	Due to the COVID-19 pandemic, our NYC office is	Book Submi... 27/09/2020
26		★	Bloodborg: The Harvest, By Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 27/09/2020
27		★	Automatic reply: Bloodborg: The Harvest by Marc Wolstenholme	Thank you for your submission to Andrew Nurnberg	Book Submi... 27/09/2020
28		★	Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 27/09/2020
29		★	query letter for Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 27/09/2020
30		☆	You have reached Tor.com Publishing Submissions Re: Fw: Submission of Bloodborg: The Harvest	THIS IS AN AUTOMATED RES...	Book Submi... 26/09/2020
31		☆	Query Received by Jessica Watterson at Sandra Dijkstra And Associates	...Your query for BLOODBORG: THE HARVEST was	Book Submi... 18/09/2020
32		☆	Query Received by Desiree Wilson at The Bent Agency	...Agency Your query for BLOODBORG: THE HARVEST was	Book Submi... 18/09/2020
33		☆	submitting Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 18/09/2020
34		★	Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 18/09/2020
35		★	Query letter for Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 18/09/2020
36		★	Query letter for Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 18/09/2020
37		★	Query letter for Bloodborg: The Harvest by Marc Wolstenholme	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 18/09/2020
38		☆	Query Received by Marisa Convisiero at Convisiero Literary Agency	...Agency Your query for BLOODBORG: THE HARVEST was	Book Submi... 18/09/2020
39		★	'Bloodborg: The Harvest'	2 ...and agreement for 'Bloodborg: The Harvest' which we	Sent 07/07/2020
40		★	From D&V Submissions Re: Submissions Marc Wolstenholme/ Bloodborg: The Harvest	Many thanks for contacting Darhansoff ...	Book Submi... 07/07/2020
41		★	Submissions Marc Wolstenholme/ Bloodborg: The Harvest	...Book: Bloodborg: The Harvest, Cyberpunk/	Sent 07/07/2020
42		☆	Reminder: Bloodborg: The Harvest	Austin Publishers sent you a document to review	Inbox 01/07/2020
43		☆	Bloodborg: The Harvest	Austin Publishers sent you a document to review	Book Submi... 24/06/2020

me, Submissions	★ Bloodborg: The Harvest by Marc Wolstenholme 2 ...Subject: Bloodborg: The Harvest by Marc	Book Submi...	11/11/2020
me, Caroline	★ Bloodborg: The Harvest By Marc Wolstenholme 2 ...Subject: Bloodborg: The Harvest By Marc	Inbox	20/10/2020
Austin Publishers via DocuSign	☆ Expiration Pending: Bloodborg: The Harvest Austin Publishers sent you a document to review	Inbox	12/10/2020
me, Eli	★ Bloodborg: The Harvest By Marc Wolstenholme 2 ...Subject: Bloodborg: The Harvest By Marc	Book Submi...	30/09/2020
Submissions	★ Automatic reply: Bloodborg: The Harvest, By Marc Wolstenholme Thank you for your submission. We will review and	Book Submi...	29/09/2020
me	★ Bloodborg: The Harvest By Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	29/09/2020
me	★ Query from England for Bloodborg: The Harvest, By Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	29/09/2020
me, info	★ Book submission: Bloodborg: The Harvest, By Marc Wolstenholme 2 ...Book submission: Bloodborg: The Harvest, By Marc	Inbox	29/09/2020
me	★ Bloodborg: The Harvest, By Marc Wolstenholme 2 ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	29/09/2020
me, Emily	★ Query for Bloodborg: The Harvest By Marc Wolstenholme 2 ...Book: Bloodborg: The Harvest, Cyberpunk/	Inbox	29/09/2020
me, Mary	★ Bloodborg: The Harvest, by Marc Wolstenholme 2 ...Subject: Bloodborg: The Harvest, by Marc	Book Submi...	28/09/2020
me, Angry	☆ Submission of Bloodborg: The Harvest 5 ...Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi...	28/09/2020
me	★ cover letter for Bloodborg: The Harvest by Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	27/09/2020
me, Andrew	☆ Bloodborg: The Harvest By Marc Wolstenholme 2 ...Subject: Bloodborg: The Harvest By Marc	Book Submi...	27/09/2020
me	☆ Bloodborg: The Harvest by Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	27/09/2020
Alexandra Weiss at The Jennifer De Chiara ...	☆ Query Received by Alexandra Weiss at The Jennifer De Chiara Literary Agency ...Agency Your query for BLOODBORG: THE HARV...	Book Submi...	27/09/2020
me	★ Bloodborg: The Harvest By Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	27/09/2020
Alex Field	★ Thanks for your e-mail to The Bindery. Re: Cover letter for Bloodborg: The Harvest, By Marc Wolstenholme Thank you for emaili...	Book Submi...	27/09/2020
me	★ Cover letter for Bloodborg: The Harvest, By Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	27/09/2020
me	☆ Bloodborg: The Harvest By Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Sent	27/09/2020
me, Headed	★ Automatic reply: Bloodborg: The Harvest, By Marc Wolstenholme ...Book: Bloodborg: The Harvest, Cyberpunk/	Book Submi...	27/09/2020


**D2- Proof of full manuscript submissions. Query submissions tend to ask for the first 10,000 words and a synopsis. The Plaintiff knew how hard it is to find representation in the literary, film and gaming industries. Moreover, he did not regard the first Pov (Josh) as the strongest section. The Plaintiff was new to the industry, and he was naïve toward the high rate of plagiarism and theft. He “When out on a limb” and filed his whole manuscript to many, in the hope that it would have a greater chance of impressing the agents. This includes the submissions to Austin Macaulay Publishers, Curtis Brown Group, Riot Forge, Madeleine Milburn, Louise Buckley at Zeno Agency, Alexander Cochran at Conville & Walsh, and Will Francis at Janklow & Nesbit, among others.**



Below I've attached a screenprint of the Will Francis at Janklow & Nesbit submission- 15/04/2020- to show that the full manuscript was attached.

## D2- Will Francis at Janklow & Nesbit submission- 15/04/2020

Submissions Marc Wolstenholme / Bloodborg: The Harvest 2 Yahoo/Book Su... ★

 **Marc Wolstenholme**  
From: marc.wolstenholme@yahoo.co.uk  
To: buckley@zenoagency.com

Wed, 15 Apr 2020 at 23:41 ★

From: Marc Wolstenholme, 07827964404, [marc.wolstenholme@yahoo.co.uk](mailto:marc.wolstenholme@yahoo.co.uk)  
Book: Bloodborg: The Harvest, Cyberpunk/ Fantasy Trilogy.  
Word count: 95,000  
To Louise Buckley at Zeno Agency - 15/04/2020  
Dear Louise,

Bloodborg: The Harvest, is the first book of a Cyberpunk/ fantasy trilogy with a complex parallel story structure of six intersecting POVs and a backstory. The stories can each stand alone but are also woven into each other to build conflict and tension; matching lulls with high points and inciting events with rug-pulling moments while watching the evolution of our protagonists as they each confront their battles. Time is an element of the storytelling, having a timeline that reaches backwards from the future present to different times in the future past, then back to Coventry in the Old-World (2025).

The book traverses the World, New Kowloon (Manhattan), Dunkirk, Zimbabwe, Coventry, Las Vegas and the river Wye. Human Diversity and the way we treat each other is also a central theme.


The world (Mother Gaia) is dying because of human activity and war. Biological weapons have been released around the world as part of the Ark's depopulation plan. The people of The Ark of Civilization (Britain) and the Assemblage (USA) built gigantic defensive walls to keep out the Nullifidian, which is a term used to dehumanize the none chosen so that the Ark Defence will commit genocide, to save humanity.




Blood is the most valued commodity in the world; Pregnant women are worth the most, chiefly women in the first eight weeks of pregnancy because the embryo produces trophoblasts, which is in high demand, to produce Fetal Sapient Serum which rejuvenates the consumer and extends their life expectancy. People are hunted for blood markers. The Founding Families have made the people of the Ark believe Gaia is dying to perpetuate war, a distraction while they harvest enough blood variance to create the perfect Bloodborg.

The Founding Families are gearing towards a world without resistance, a one-world slave machine where the survivors see them as gods. They plan to re-house their minds in Bloodborgs, the pinnacle of all creation, the ultimate cybernetic human beings; Merging AI, In-brain computers, robotics and synthetic human self-regenerating tissue with the perfect cocktail of endless blood to be immune to all diseases and ageing.

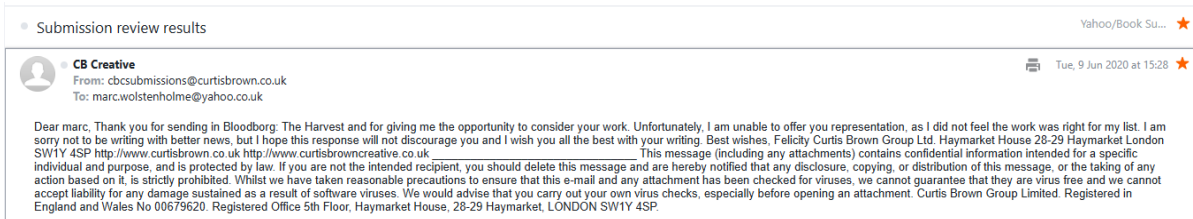
Our protagonists are all being radicalized in different and complex ways by B, an ancient Cyborg, thought to be dead who is working with Teki Nagasaki, the ancient hacker who created Deep-root which is an In-brain computer network. Teki and B are leading a fight back against the Founding Families, but this is very implicit in this book. In This book, our protagonists begin their journeys.

I'm a college lecturer of Public Services and Sports. I have lived a life of struggle and strife. Growing up with severe dyslexia was difficult. I left my family home at the tender age of 14 because of violence. At 16, I joined the British Army. At 17, I was in a coma after an RTA in Germany. I struggled on, serving our country with injury and mental illness until I was medically discharged in 2011. I continued to suffer with PTSD, depression, anxiety and sleep disorders until gaining more help and diagnosis of my struggles in 2017.

 [Download all attachments as a zip file](#)

Attachment	File Name	Size
	Synopsis n... .docx	25.5kB
	Bloodborg ....docx	45.8kB
	Bloodborg ....docx	45.8kB





D3- [cbcsubmissions@curtisbrown.co.uk](mailto:cbcsubmissions@curtisbrown.co.uk) rejection email – (Tue, 9 Jun 2020 at 15:28)

*“Dear marc, Thank you for sending in Bloodborg: The Harvest and for giving me the opportunity to consider your work. Unfortunately, I am unable to offer you representation, as I did not feel the work was right for my list. I am sorry not to be writing with better news, but I hope this response will not discourage you and I wish you all the best with your writing. Best wishes, Felicity Curtis Brown Group Ltd. Haymarket House 28-29 Haymarket London SW1Y 4SP <http://www.curtisbrown.co.uk> <http://www.curtisbrowncreative.co.uk>*

*\_\_\_\_\_ This message (including any attachments) contains confidential information intended for a specific individual and purpose, and is protected by law. If you are not the intended recipient, you should delete this message and are hereby notified that any disclosure, copying, or distribution of this message, or the taking of any action based on it, is strictly prohibited. Whilst we have taken reasonable precautions to ensure that this e-mail and any attachment has been checked for viruses, we cannot guarantee that they are virus free and we cannot accept liability for any damage sustained as a result of software viruses. We would advise that you carry out your own virus checks, especially before opening an attachment. Curtis*

1 *Brown Group Limited. Registered in England and Wales No 00679620. Registered Office 5th*  
2 *Floor, Haymarket House, 28-29 Haymarket, LONDON SW1Y 4SP. “*

3  
4 **D4- Riot’s connections- In 2019 & 2020, Riot Games were soliciting narrative**  
5 **and gaming content through their Riot forge portal. It was their private system and not**  
6 **email which makes it harder to prove submission. In this period Riot were also soliciting**  
7 **material from agents for Arcane. This is confirmed by both of the Arcane “Showrunners”**  
8 **in Bridging the Rift, The making of Arcane. Additionally, Riot has a close working**  
9 **relationship with many of the agencies which Bloodborg was submitted to.**  
10

11 **Below is a brake down of Riot’s relationship with The United Talent Agency**  
12 **(UTA) who owns The Curtis Brown Group.**  
13

14  
15 UTA's Gaming & Esports department has been an industry leader in representing  
16 gamers, esports athletes, streamers, and gaming organizations. In 2018, UTA acquired two  
17 esports agencies, Press X and Everyday Influencers, to expand its presence in the gaming  
18 industry.  
19

20 In 2019, UTA added Travis Mynard, formerly of Riot Games, to its esports  
21 management division. Mynard had experience working with Riot's North America League of  
22 Legends Championship Series (NA LCS) and the company's international League of Legends  
23 esports league.  
24

25 The United Talent Agency (UTA) acquired the Curtis Brown Group in June 2022.

Both UTA and Curtis Brown Group were involved with casting talent for Arcane. Between them, they cast both of the main roles and two of the other biggest roles, and perhaps more.

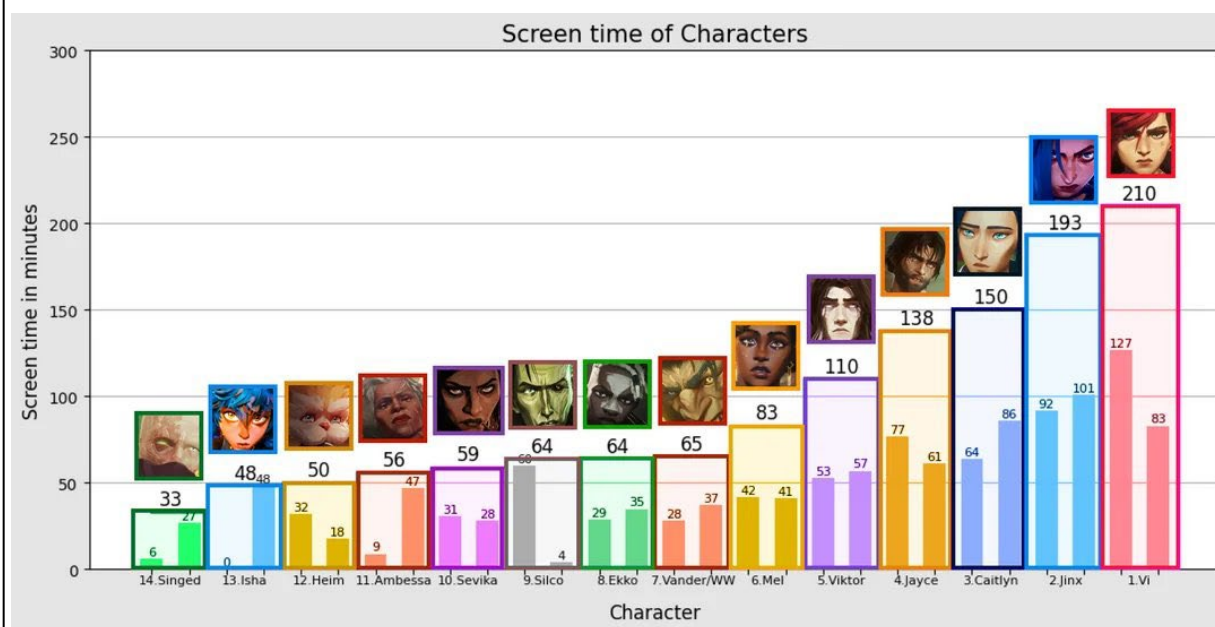
Hailee Steinfeld: Voices Vi in Arcane. Steinfeld is a client of UTA.

Ella Purnell: Voices Jinx. Purnell is a client of Curtis Brown Group.

Katie Leung: Voices Caitlyn Kiramman. Leung is represented by Curtis Brown

Harry Lloyd: Voices Viktor. Lloyd is represented by Curtis Brown Group.

These four characters represented by UTA and Curtis Brown Group received significantly more screen time than most with Steinfeld, Purnell and Leung being the top three, and Lloyd being the 5th most onscreen character.



1 This evidences relationships between Riot Games and the two linked agencies of  
2 UTA and Curtis Brown Group. This also evidences their involvement in Arcane.  
3  
4  
5  
6

7 **Exhibit E- Highlighting Ongoing Copyright Concerns.**

8 Please note, Exhibit E has no bearing on this case at this time, but the Plaintiff is  
9 being transparent and forthcoming to show a history and pattern of some people who may or may  
10 not have been involved in the Plaintiff's work (Bloodborg) being used to bail out the failing  
11 show of Arcane... Allegedly.  
12

13 The Plaintiff will highlight Uk based complaints of alleged Copyright  
14 infringements of the M.W. Wolf catalogue of fiction, against Jonny Geller and Felicity Blunt of  
15 Curtis Brown Group, now a subsidiary of United Talent Agency (UTA). Many of these  
16 infringements are alleged to have also been sold to Netflix, where Arcane was distributed.  
17

18 Jonny Geller and Felicity Blunt were the two main agents the Plaintiff had been  
19 trying to gain representation from since 2018. The Plaintiff had shared much work with them.  
20 The Plaintiff grew suspicious after time and time again his work, or elements of It seemingly  
21 ended up on shark tank writing room tables and was alleged to be cut up and fed into other  
22 shows. In 2021, The Plaintiff informed Jonny Geller of the alleged copyright infringement of  
23 Arcane, partly to see how he would react. After monitoring, the other alleged infringements  
24 continued.  
25  
26

1 The Plaintiff wrote a book Called Bee My Agent, about a literary agent swiping  
2 and selling the slush pile of unsolicited aspiring writers' works and about using synopses to  
3 give to his "Pet Writers" to cut up and feed into their own books. Bee My Agent attempted a  
4 metanarrative, predicting that it would be misused and abused in the same manner... and it was.  
5 With this book, the Plaintiff completed a writing course with Curtis Brown Creatives. On the  
6 course he informed the other students of the suspected infringements, to warn them and to test  
7 the reactions of Jonny Geller. The plaintiff used X to highlight the misuse of his work and to  
8 show how agents are selling "Slush Pile" synopses and manuscripts to big companies such as  
9 Netflix and Marvel, cutting out the aspiring writers and creating an industry in which over 90%  
10 of books sell next to nothing.

13 When Lisa Jewell released Breaking the Dark, it was clearly my work cut up and  
14 forced into a character of Marvels. I began to reveal to Jonny on X that I knew people had used  
15 my work. Around the same time, Curtis Brown Creatives tried to appease me with a 50 pound  
16 discount after winning a writing competition they ran. I was willing to settle quietly, but Lisa's  
17 reaction to my complaint was offish and rude.

19 I have live copyright infringement concerns and complaints in the UK, which I  
20 have not yet officially open proceedings for, but the solicitors of Curtis Brown Group and by  
21 extension UTA have been informed and have not been very helpful.

1                   **Declaration**

2                   I, Marc Wolstenholme, declare under penalty of perjury under the laws of the  
3 United States of America that the foregoing is true and correct to the best of my knowledge and  
4 belief. I submit this declaration in support of PLAINTIFF'S SECOND AMENDED  
5 COMPLAINT (SAC) and PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO  
6 DISMISS- providing a detailed comparison of the alleged infringement of my original work,  
7 Bloodborg, by Riot Games, Inc.  
8

9  
10                   The Plaintiff will file a number of attachments to add as evidence to support his  
11 claim and to be added to court bundles of evidence.  
12

13  
14                   These include, but not limited to:

- 15                   1. PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE-  
16                   EPISODE 1  
17  
18                   2. DECLARATION OF MARC WOLSTENHOLME- Vi Vs Rook Overview  
19                   Comparison  
20  
21                   3. PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE- Neva,  
22                   Ambessa, and Mel Medarda, Ref Viktor  
23  
24                   4. PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE- Psycho-  
25                   Emotional Analysis  
26

1 5. PLAINTIFF’S MOTION IN LIMINE TO ADMIT EVIDENCE- The two  
2 Brothers

3 6. PLAINTIFF’S REQUEST FOR REMOTE APPEARANCE AT CASE  
4 MANAGEMENT HEARING:  
5

6 7. PLAINTIFF’S MOTION IN LIMINE TO ADMIT EVIDENCE-  
7 Bloodborg Viktor and Warwick  
8

1 **The Plaintiff, Marc Wolstenholme, M.W. Wolf.**

2 **Date: JANUARY 29, 2025**

3 **Signed:** *M. WOLSTENHOLME.*  
4